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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**  
17 **COMPANY,**

18 **Debtors.**

19  Affects PG&E Corporation  
20  Affects Pacific Gas and Electric Company  
 Affects both Debtors

21 \* *All papers shall be filed in the Lead Case, No.*  
19-30088 (DM).

12 Bankruptcy Case No. 19-30088 (DM)

13 Chapter 11

14 (Lead Case) (Jointly Administered)

15 **SECOND STIPULATION TO MODIFY**  
16 **SCHEDULE FOR DISCOVERY AND**  
17 **MOTION FOR SUMMARY JUDGMENT ON**  
18 **OBJECTION TO CLAIM OF AMIR**  
19 **SHAHMIRZA AND KOMIR, INC.**

20 [Related to Dkt. Nos. 12130 and 13921]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors  
2 (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases  
3 (the “**Chapter 11 Cases**”), on the one hand, and Creditors Amir Shahmirza (Agent for Komir, Inc.) and  
4 Komir, Inc. (together, “**Shahmirza**,” and, collectively with the Reorganized Debtors, the “**Parties**” and  
5 each, a “**Party**”) on the other hand, by and through their respective counsel, hereby stipulate and agree  
6 as follows:

7 **RECITALS**

8 A. On March 20, 2019, Amir Shahmirza filed proof of claim number 2090 in the Chapter 11  
9 Cases.

10 B. On April 8, 2022, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to*  
11 *Proof of Claim No. 2090 Filed by Amir Shahmirza* (the “**Objection**”) [Dkt. No. 12130].

12 C. On January 31, 2023, Amir Shahmirza (as agent of, and acting on behalf of, Komir, Inc.)  
13 filed proof of claim number 109855 in the Chapter 11 Cases, amending proof of claim number 2090.

14 D. On June 12, 2023, the Court issued its *Memorandum Decision on Motion for Partial*  
15 *Summary Judgment and Counter-Motion for Summary Judgment* [Dkt. No. 13832] and corresponding  
16 *Order Granting Motion for Partial Summary Judgment* [Dkt. No. 13833] and *Order Denying Counter-*  
17 *Motion for Summary Judgment* [Dkt. No. 13834].

18 E. On July 11, 2023, the Court held a status conference on the Objection.

19 F. On July 25, 2023, upon the stipulation filed by the Parties [Dkt. No. 13920], the Court  
20 entered the *Order Approving Stipulation Regarding Schedule for Discovery and Motion for Summary*  
21 *Judgment on Objection to Claim of Amir Shahmirza and Komir, Inc.* [Dkt. No. 13921] (the “**Scheduling**  
22 **Order**”) setting forth a schedule for discovery and briefing for a second motion for summary judgment  
23 by Shahmirza.

24 G. On September 5, 2023, Shahmirza filed the *Claimant’s Second Motion for Partial*  
25 *Summary Judgment of Issues in Reorganized Debtors[ ] Objection to Claim #2090 and Claimant’s*  
26 *Response Thereto* (the “**Shahmirza MSJ**”) [Dkt. No. 14007].

27 H. The Parties modified the Scheduling Order through a stipulation filed on October 24,  
28 2023, [Dkt. No. 14090] and the order entered on October 25, 2023 [Dkt. No. 14095].

1           I.       On November 3, 2023, the Reorganized Debtors filed *PG&E's Memorandum of Points*  
2       *and Authorities in Opposition to Claimant's Motion for Partial Summary Judgement* [Dkt. No. 14111].

3           J.       The Parties have conferred further regarding discovery and briefing for the Shahmirza  
4       MSJ and agree to modify the schedule as set forth below.

5

6           **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**  
7       **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**  
8       **JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

9           1.       The Scheduling Order is modified, as provided herein:

10           a.      The Parties shall exchange written reports of witnesses retained to provide expert  
11           testimony by December 4, 2023.  
12           b.      The Parties shall complete the depositions of all such retained expert witnesses by  
13           January 16, 2024.

14           2.       The Scheduling Order, as modified in any Order approving this Stipulation, remains  
15       subject to adjustment by agreement between the parties with Court approval, or by order of the Court  
upon good cause shown.

16           3.       The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies  
17       arising from this Stipulation or any Order approving the terms of this Stipulation.

18           4.       In the event that the terms of this Stipulation are not approved by the Bankruptcy Court,  
19       it shall be null and void and have no force or effect.

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21       Dated: November 17, 2023

22       KELLER BENVENUTTI KIM LLP  
23       ROVENS & LAMB LLP  
24       LAW OFFICES OF JENNIFER L. DODGE, INC.

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25       \_\_\_\_\_  
26       /s/ *Thomas B. Rupp*  
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28       Attorneys for Debtors and  
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25       /s/ *Lawrence A. Jacobson*  
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27       Attorneys for Amir Shahmirza (Agent  
          for Komir, Inc.) and Komir, Inc.